

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**Aug 17, 2022**

SEAN F. McAVOY, CLERK

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
CHRISTOPHER GARY CARLSON,  
  
Defendant.

Case NO: 2:22-CR-96-RMP-1

STIPULATED PROTECTIVE  
ORDER REGARDING  
IDENTIFICATION OF MINOR  
VICTIMS PURSUANT TO  
18 U.S.C. § 3509

BEFORE THE COURT is the parties' Stipulated Motion for Protective Order Regarding Identification of Minor Victims Pursuant to 18 U.S.C. § 3509, ECF No. 18. The parties request that the motion be heard on an expedited basis. *Id.* Having reviewed the motion, the record, and relevant law, the Court is fully informed.

Defendant is charged with receipt of child pornography in violation of 18 U.S.C. §2252A(a)(2), (b)(1). ECF No. 1. Given the nature of the allegations in this case, the parties move the Court to issue a protective order to protect minor victims from public disclosure of their names. ECF No. 18 at 4–5. The Court finds that good cause exists to grant the motion

Accordingly, **IT IS HEREBY ORDERED** that the parties' Stipulated Motion for Protective Order Regarding Identification of Minor Victims Pursuant to

STIPULATED PROTECTIVE ORDER REGARDING IDENTIFICATION OF  
MINOR VICTIMS PURSUANT TO 18 U.S.C. § 3509 - 1

1 18 U.S.C. § 3509, **ECF No. 18**, is **GRANTED**. The terms of the protective order  
2 are set forth below.

3 1. **IT IS FURTHER ORDERED** that the privacy protection measures  
4 mandated by 18 U.S.C. § 3509(d), which apply when a case involves a person under  
5 the age of eighteen years who is alleged to be a victim of a crime of sexual  
6 exploitation, or a witness to a crime committed against another person, apply to this  
7 case.

8 2. **IT IS FURTHER ORDERED** that all persons acting in this case in a  
9 capacity described in 18 U.S.C. § 3509(d)(1)(B), shall:

- 10 a. Keep all documents that disclose the names, identities, or any  
11 other information concerning minors in a secure place to which  
12 no person who does not have reason to know their contents has  
13 access;  
14  
15 b. Disclose such documents or the information in them that  
16 concerns minors only to persons who, by reason of their  
17 participation in the proceeding, have reason to know such  
18 information;  
19  
20 c. Not permit Defendant himself to review discovery outside the  
21 presence of defense counsel or a defense investigator;  
22  
23 d. Not permit Defendant to keep discovery in his own possession  
24 outside the presence of defense counsel or a defense investigator;  
25 and  
26  
27 e. Not permit Defendant to keep, copy, or record the identities of  
28 any minor or victim identified in discovery in this case.

3. **IT IS FURTHER ORDERED** that all papers to be filed in Court that  
disclose the names or any other information identifying or concerning minors shall

1 be filed under seal without necessity of obtaining a Court order, and that the person  
2 who makes the filing shall submit to the Clerk of the Court:

- 3 a. The complete paper to be kept under seal; and  
4 b. The paper with the portions of it that disclose the names or other  
5 information identifying or concerning children redacted, to be  
6 placed in the public record.

7 4. **IT IS FURTHER ORDERED** that the parties and the witnesses shall  
8 not disclose minors' identities during any proceedings connected with this case. The  
9 parties and witnesses will refer to alleged minor victims only by using agreed-upon  
10 initials or pseudonyms (e.g., "Minor Victim 1"), rather than their bona fide names,  
11 in motions practice, opening statements, during the presentation of evidence, in  
12 closing arguments, and during sentencing.

13 5. **IT IS FURTHER ORDERED** that the Government may produce  
14 discovery to the defense that discloses the identity and images of alleged minor  
15 victims in this case, in order to comply with the Government's discovery obligations.  
16 Defendant, the defense team, Defendant's attorneys and investigators, and all of their  
17 externs, employees, and/or staff members, shall keep this information confidential  
18 as set forth above.

19 6. **IT IS FURTHER ORDERED** that this Order shall apply to any  
20 attorneys who subsequently become counsel of record, without the need to renew or  
21 alter the ORDER.

22 7. **IT IS FURTHER ORDERED** that this Order shall apply to the  
23 personal identifying information and images of any minors who are identified over  
24 the course of the case, whether or not such minors are known to the Government  
25 and/or Defendant at the time the Order is entered by the Court.  
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